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By Phil Hill & Associates

Aligning Accountability: How New Federal Rules Reshape Higher Ed Program Evaluation

The Department of Education is proposing to revise its existing Financial Value Transparency (FVT) and Gainful Employment (GE) regulations to align with the new One Big Beautiful Bill Act (OBBA). This creates a single, simplified accountability framework for all postsecondary programs participating in the federal Direct Loan Program, focusing on a straightforward implementation of the new statute.

PREVIOUS SYSTEM: FVT & GE REGULATIONS

- Two Different Metrics**
Programs evaluated using two separate measures.
- BROADER EARNINGS COHORT**
Median earnings calculation included both working AND non-working graduates, potentially lowering the median value.
- HARSHER CONSEQUENCES FOR GE PROGRAMS**
Failed Gainful Employment (GE) programs could lose eligibility for ALL Title IV federal student aid, not just loans.
- LONGER INELIGIBILITY PERIOD**
A program that became ineligible was barred from re-establishing eligibility for three years.
- SPECIAL TREATMENT FOR SOME GRADUATE PROGRAMS**
"Qualifying graduate programs" allowed a longer timeframe for failing reporting requirements (e.g., medicine, dentistry).

NEW SYSTEM: PROPOSED OBBA ALIGNMENT

- One Simplified Metric**
The Ratio to Earnings (R/E) rate is eliminated. Only the Earnings Premium remains.
- "WORKING-ONLY" COHORT**
A major shift: median earnings calculations for program completers now ONLY include graduates who are working.
- LIMITED CONSEQUENCES FOR ALL PROGRAMS**
The penalty for failure is consistent for all programs: loss of Direct Loan Program eligibility only.
- SHORTER INELIGIBILITY PERIOD**
The period of ineligibility for a failing program is reduced from three years to two years.
- HARMONIZED RULES FOR ALL PROGRAMS**
The special "qualifying graduate program" designation is removed to ensure all programs are treated alike.

PROPOSED OBBA ALIGNMENT TO CREATE A SINGLE, SIMPLIFIED SYSTEM

THE NEW ACCOUNTABILITY FRAMEWORK AT A GLANCE



A Single Test: The Earnings Premium
All programs are now judged by one metric: the "Earnings Premium," meaning if graduates' earnings meet a specific threshold.



How the Test Works
The median annual earnings of a program's working graduates are compared to the median earnings of working adults with a high school diploma (undergraduate) or a bachelor's degree (graduate).



The Consequence for Failure
If a program fails the earnings premium test in two out of any three consecutive years, it loses eligibility to participate in the federal Direct Loan Program.

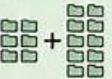
KEY OBBA IMPLEMENTATION DETAILS



A Straight Implementation of the OBBA Statute
The Department's intent is for all programs to be subject to the earnings premium requirements as described in the OBBA law.



No Regional Income Adjustments in Earnings Threshold
The earnings benchmark is based on state-level or national-level data, not on more granular regional or metropolitan area income data.



Expanded Cohorts for Small Programs
If a program has fewer than 30 completers, the Department will look back at error years and aggregate similar programs to build a statistically reliable cohort.



Streamlined Warnings and Reporting
Institutional reporting requirements are reduced, and the student acknowledgment process just-in-time has been eliminated to reduce administrative burden.

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Cisco Certified Support Technician (CCST) Cybersecurity Sample Questions (Q196-Q201):

NEW QUESTION # 196

What is an insider threat?

- A. The accidental disclosure of sensitive information.
- **B. A threat posed by an individual with authorized access to an organization's systems and data.**
- C. A vulnerability in an organization's network infrastructure.
- D. A security breach caused by an external attacker.

Answer: B

Explanation:

Insider threats refer to risks and vulnerabilities that arise from individuals who have authorized access to an organization's systems, networks, or data. These individuals may intentionally or unintentionally cause harm, such as stealing confidential information, sabotaging systems, or disclosing sensitive data to unauthorized entities.

NEW QUESTION # 197

What is encryption?

- **A. A process of converting plaintext into ciphertext to protect data confidentiality**
- B. A process of converting plaintext into binary code to enhance data accessibility
- C. A process of converting binary code into plaintext to improve data reliability
- D. A process of converting ciphertext into plaintext to secure data integrity

Answer: A

Explanation:

Encryption is the process of converting plaintext (original data) into a coded or unreadable format known as ciphertext. This ensures that if the data is intercepted or accessed by unauthorized individuals, they would not be able to understand the information without the appropriate decryption key. Encryption is used to protect the confidentiality and privacy of sensitive data during transmission or storage.

NEW QUESTION # 198

What is the purpose of performing a vulnerability scan?

- **A. To identify any exploitable weaknesses in a system or network**
- B. To detect and block malicious network traffic
- C. To encrypt sensitive data transmission
- D. To assess the performance and latency of network devices

Answer: A

Explanation:

Vulnerability scanning is conducted to identify potential weaknesses or security flaws in a system or network that could be exploited by attackers. By conducting regular vulnerability scans, organizations can proactively discover and address vulnerabilities before they are exploited, ensuring the overall security and integrity of their systems. This helps in preventing unauthorized access, data breaches, and potential damage to the network infrastructure.

NEW QUESTION # 199

Which of the following is NOT a typical phase of the planning process in cybersecurity?

- A. Vulnerability scanning
- B. Incident response planning
- C. Risk assessment
- D. Policy development

Answer: A

Explanation:

The planning process in cybersecurity typically includes several phases, such as risk assessment, policy development, and incident response planning. Vulnerability scanning, although an important activity in cybersecurity, is considered a technical control rather than a specific phase of the planning process.

NEW QUESTION # 200

What is smishing?

- A. A form of social engineering attack that uses SMS or text messages to trick victims into revealing sensitive information.
- B. A physical attack where an unauthorized person gains entry to a restricted area by following closely behind an authorized person.
- C. A type of phishing attack that targets specific individuals or organizations.
- D. A cyber attack where an attacker manipulates and deceives an individual to reveal sensitive information.

Answer: A

Explanation:

Smishing, short for SMS phishing, is a social engineering attack that utilizes SMS or text messages to deceive individuals into disclosing sensitive information or performing certain actions. These messages often mimic legitimate sources, such as banks or service providers, and typically contain links or phone numbers that, when accessed or called, lead to malicious activities. Smishing takes advantage of the ubiquity of mobile devices and users' tendency to trust text messages.

NEW QUESTION # 201

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